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September 18, 2023

By eFile & E-mail

Hon. Martin Glenn
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton U.S. Custom House
One Bowling Green, Courtroom 523
New York, NY 10004-1408

Re: *In re Celsius Network LLC*, No. 22-10964 (MG) – Requested Clarification to
Confirmation Case Management Procedures

Dear Chief Judge Glenn:

Pursuant to paragraph 7 of the *Order Establishing Case Management Procedures for the Confirmation Hearing* [Docket No. 3478] (the “Confirmation Case Management Procedures”), the Debtors write to request clarification to the same. Pursuant to the Confirmation Case Management Procedures, the Debtors’ case in support of confirmation will commence on October 2, 2023, and cases presented by those opposing confirmation will take place on October 16, 2023.¹

The Debtors would like to streamline the presentation of witnesses—in particular, those witnesses that the Debtors may call in their affirmative case in support of confirmation that an objecting party may also wish to call as part of their case against confirmation. In that scenario, the Debtors would request that the opposing party’s examination of the Debtors’ witness occur at the same time that the Debtors present the witness’ direct testimony and make each witness available for cross examination.

¹ See also *Notice of Hearing to Consider Confirmation of the Debtors’ Chapter 11 Plan and Related Voting and Objection Deadlines* [Docket No. 3344].

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The Debtors are willing to waive any objection as to the scope of cross examination in order to both streamline the witness examination process and facilitate a scenario in which witnesses do not have to travel to New York twice two weeks apart. For the avoidance of doubt, the Debtors are not currently aware of any objecting party seeking to call one of the Debtors' witnesses, but the Debtors are nevertheless working to plan witnesses' travel schedules.

Accordingly, the Debtors request that the Court consider making this clarification in the Confirmation Case Management Procedures.

Sincerely,

/s/ Chris Koenig

Chris Koenig